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*Of Counsel:*

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May 14, 2007

Courtney Boyd (AIS# 208921)  
Easterling Correctional Facility  
200 Wallace Drive  
Clio, Alabama 36017

Re:	Claimant:	Courtney Boyd
	Insured(s):	Prison Health Services, Inc., et al.
	Location:	Easterling Correctional Facility
	File No.:	7430-90

Dear Mr. Boyd:

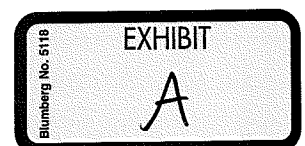
Please find enclosed the Defendants' Responses to Interrogatories. Please note that the enclosed is an unsigned copy. I will forward an executed copy of these Responses immediately upon my receipt of same.

Sincerely,



R. Brett Garrett

RBG2/kml  
Enclosure



IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA

COURTNEY BOYD (AIS #208921),

\*

\*

Plaintiff,

\*

V.

2:06-CV-511-WKW

\*

DR. DARBOUZE, et al.,

\*

Defendants.

\*

**DEFENDANTS KAY WILSON, R.N., H.S.A., JEAN DARBOUZE, M.D., CYNTHIA WAMBLES, R.N., AND SUSANNE BUSH, L.P.N.'S RESPONSES TO PLAINTIFF'S INTERROGATORIES**

COME NOW Defendants, Kay Wilson, R.N., Jean Darbouze, M.D., Cynthia Wambles, R.N., and Susanne Bush, L.P.N., and offer the following in response to Plaintiff's Interrogatories:

Plaintiff's Interrogatory 5: If they ever had a serious complaint or grievance filed against you by any inmate. (*sic*). If so, please produce a clear copy of every one of them?

**Response:** The Defendants object to Plaintiff's Interrogatory 5 in that the request is irrelevant, over broad, and is not designed to elicit discoverable information.

**RESPONSE OF KAY WILSON, R.N., H.S.A.**

Plaintiff's Interrogatory 4: How long have they been employed by Prison Health Service (*sic*)?

**Response:** This Defendant has been employed by PHS since November 3, 2003.

Plaintiff's Interrogatory 8: Listed (*sic*) your complete educational back ground. This includes any special classes you participated (*sic*) in? Produce each copy of the classes you all was (*sic*) in.

**Response:** This Defendant attended Troy State University where I received a Bachelor of Science Degree in Nursing.

Plaintiff's Interrogatory 10: Ms. Wilson, are you in charge of all the nurses and Doctor?

**Response:** This Defendant is employed as Health Services Administrator (H.S.A.) for Easterling Correctional Facility.

This Defendant objects to the phrasing of Plaintiff's Interrogatory 10 insofar as it does not define "in charge of." Without waiving said objection, it is part of this Defendant's responsibility to supervise certain employees at Easterling's health care facility.

**RESPONSE OF JEAN DARBOUZE, M.D.**

Plaintiff's Interrogatory 4: How long have they been employed by Prison Health Service (*sic*)?

**Response:** This Defendant has been employed by PHS since November 3, 2003.

Plaintiff's Interrogatory 8: Listed (*sic*) your complete educational back ground. This includes any special classes you partiscipated (*sic*) in? Produce each copy of the classes you all was (*sic*) in.

**Response:** This Defendant is a physician trained in Internal Medicine. This Defendant received his medical training at The University of Ravia School of Medicine located in Italy. This Defendant received Internal Medicine training at Grady Memorial Hospital/Moorhouse School of Medicine located in Atlanta, Georgia.

Plaintiff's Interrogatory 9: Dr. Darbouze, can x-ray read the soft tissue in the spinal cord if something was wrong with it? Or can x-ray only read broken bone? (*sic*)

**Response:** This Defendant objects to Plaintiff's Interrogatory 9 in that it assumes that x-rays can only identify two types of conditions, "soft tissue in the spinal cord" or "broken bone." Without waiving said objection, it is this Defendant's best response that x-rays can be used to evaluate a number of medical conditions.

**RESPONSE OF CYNTHIA WAMBLES, R.N.**

Plaintiff's Interrogatory 4: How long have they been employed by Prison Health Service (*sic*)?

**Response:** This Defendant has been employed by PHS since December, 2005.

Plaintiff's Interrogatory 8: Listed (*sic*) your complete educational back ground. This includes any special classes you partiscipated (*sic*) in? Produce each copy of the classes you all was (*sic*) in.

**Response:** This Defendant attended Troy State University where she received a Bachelor of Science Degree in Nursing.

Plaintiff's Interrogatory 11: Ms. Wambles is it standard for an nurse (*sic*) to tell an inmate to sign up for sick call when his lower back and body goes out? Is it standard for an nurse (*sic*) to tell an inmate there nothing (*sic*) wrong with him when he is brought up their (*sic*) on a stretcher?

**Response:** This Defendant objects to Plaintiff's Interrogatory 11 as stated. Specifically, it is impossible for this Defendant to determine the meaning of "standard" in this context. Moreover, this Interrogatory assumes certain factual information that cannot be addressed in general terms. Without waiving said objection, as a general rule, nurses evaluate patients and make decisions with regard to necessary care based on their assessment of the patient at the time of the examination.

**RESPONSE OF SUSANNE BUSH, L.P.N.**

Plaintiff's Interrogatory 4: How long have they been employed by Prison Health Service (*sic*)?

**Response:** This Defendant has been employed by PHS since November 3, 2003.

Plaintiff's Interrogatory 8: Listed (*sic*) your complete educational back ground. This includes any special classes you partiscipated (*sic*) in? Produce each copy of the classes you all was (*sic*) in.

**Response:** This Defendant attended George C. Wallace Community College where she received an L.P.N. Degree.

Plaintiff's Interrogatory 12: Ms. Bush is it standard for an nurse (*sic*) to have an inmate who's (*sic*) lower back and body has gone out, and who was brought to the her (*sic*) on a stretcher to have this inmate pick up and place him in the waiting room?

**Response:** This Defendant objects to Plaintiff's Interrogatory 11 as stated. Specifically, it is impossible for this Defendant to determine the meaning of "standard" in this context. Moreover, this Interrogatory assumes certain factual information that cannot be addressed in general terms. Without waiving said objection, as a general rule, nurses evaluate patients and make decisions with regard to necessary care based on their assessment of the patient at the time of the examination.

\_\_\_\_\_  
KAY WILSON, R.N., H.S.A.

STATE OF ALABAMA            )  
  )  
COUNTY OF \_\_\_\_\_ )

Sworn to and subscribed before me on this the \_\_\_\_ day of \_\_\_\_\_, 2007.

\_\_\_\_\_  
Notary Public

My Commission Expires:

\_\_\_\_\_

\_\_\_\_\_  
JEANE DARBOUZE, M.D.

STATE OF ALABAMA            )  
  )  
COUNTY OF \_\_\_\_\_ )

Sworn to and subscribed before me on this the \_\_\_\_ day of \_\_\_\_\_, 2007.

\_\_\_\_\_  
Notary Public

My Commission Expires:

\_\_\_\_\_

\_\_\_\_\_  
CYNTHIA WAMBLES, R.N.

STATE OF ALABAMA            )  
  )  
COUNTY OF \_\_\_\_\_ )

Sworn to and subscribed before me on this the \_\_\_\_ day of \_\_\_\_\_, 2007.

\_\_\_\_\_  
Notary Public

My Commission Expires:  
\_\_\_\_\_

\_\_\_\_\_  
SUSANNE BUSH, L.P.N.

STATE OF ALABAMA )

)

COUNTY OF \_\_\_\_\_ )

Sworn to and subscribed before me on this the \_\_\_\_ day of \_\_\_\_\_, 2007.

\_\_\_\_\_  
Notary Public

My Commission Expires:  
\_\_\_\_\_

Respectfully submitted,

s/ R. Brett Garrett

R. Brett Garrett

Alabama State Bar Number GAR085

Attorney for Defendant Susanne Bush,  
L.P.N.

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has been served by U.S. Mail this the **14<sup>th</sup>** day of **May, 2007**, to:

Courtney Boyd (AIS# 208921)  
EASTERLING CORRECTIONAL FACILITY  
P.O. Box 120  
Clio, Alabama 36017

s/ R. Brett Garrett  
R. Brett Garrett GAR085  
Attorney for Defendant Susanne Bush,  
L.P.N.